

## REMARKS/ARGUMENTS

The arguments and amendments presented herein include the arguments and amendments Applicants discussed with the Examiner during a phone interview dated May 7, 2008. The Examiner requested Applicants to submit the discussed arguments and amendments for reconsideration, which Applicants present herein. Applicants submit that the arguments and amendments presented herein make the substance of the phone interview of record to comply with 37 CFR 1.133. If the Examiner believes that further information on the interview needs to be made of record to comply with the requirements, Applicants request the Examiner to identify such further information.

In this Amendment, Applicants have amended claims and cancelled non-method claims 1-6, 13-19, and 21 from further consideration in this application. Applicants are not conceding that the subject matter encompassed by claims prior to this Amendment is not patentable over the art cited by the Examiner. Claims were amended and were cancelled in this Amendment solely to facilitate expeditious prosecution of the pending claims. Applicant respectfully reserves the right to pursue claims, including the subject matter encompassed by claims, as presented prior to this Amendment and additional claims in one or more continuing applications.

1. Amended Claim 20 Complies with 35 U.S.C. §112, par. 1

The Examiner rejected claim 20 on the grounds that the Specification does not provide adequate written description for the claim requirements. (Third Office Action, pg. 4) Applicants believe that the Examiner may have erroneously rejected the claims based on the assumption that the paragraph numbers Applicants referenced were paragraphs in the printed publication, Pub. No. 2005/0125767 ("Printed Publication"), when in fact Applicants were referencing paragraph numbers in the filed Specification. Thus, when Applicants referenced paragraphs 60-61, Applicants were referring to paragraphs in the filed Specification, not the Printed Publication. To avoid any further confusion, below and throughout this response, paragraph numbers that are referenced refer to the paragraph numbers in the Printed Publication.

Amended claim 20 recites determining whether an end of the partial program instruction statement is reached and in response to determining that the end of the program instruction statement is reached, generating proposals.

Applicants amended this claim to recite determining whether an end of the partial program instruction statement is reached. This amended claim requirement is disclosed on at least para. 83, lines 24-30 of the Printed Publication, which discloses that the cursor is moved “until the end of the user-entered partial statement is reached.” Thus, the Specification discloses determining whether the end of the partial program instruction is reached because the cursor is moved until this point is reached, which requires a determination of the end of the user-entered partial statement..

The second limitation of claim 20 recites generating proposals in response to determining that the end of the program instruction statement is reached. This requirement is disclosed in para. 83 of the Printed Publication that discloses that if the end of the user entered partial statement is reached, control passes to block 1220 in FIG. 12 to begin the proposal generation phase. (Printed Publication, para. 83, lines 23-30 and para. 84, lines 1-4).

Applicants submit that the Specification provides adequate written description for the requirements of amended claim 20. Accordingly, Applicants request the Examiner to withdraw the written description of claim 20.

## 2. Claims 7-12 are Patentable Over the Cited Art

The Examiner rejected claims 7-12 as anticipated (35 U.S.C. §102) by Shulman (U.S. Patent No. 6,026,233). Applicants traverse with respect to the amended claims.

Amended claim 1 recites a method of providing a code assist function which suggests candidates responsive to a parsing of a partial program instruction statement, said method comprising: parsing a partial program instruction statement into tokens divided into keywords and variables; determining whether the tokens match one of a plurality of syntax statements in a syntax library for a computer language in which the partial program instruction statement is written; moving a cursor positioned on one of the tokens for which the match is determined to a following token in response to determining that the token matches one of the syntax statements in the syntax library; in response to determining that the token on which the cursor is positioned does not match one of the syntax statements generating proposals from the cursor position based on previous tokens in the partial program instruction that matched syntax statements in the syntax library; and providing proposals to append to the partial program instruction statement to a user responsive to the parsing of the partial program instruction statement.

Applicants amended claim 1 to recite that the partial program statement is divided into keywords and variables. This added requirement is disclosed in the Specification, see, Printed Publication, para. 73, line 10. Applicants further added the requirement that the syntax statements in a syntax library for a computer language in which the partial program instruction statement is written. This added requirement is disclosed in the Specification, see Printed Publication, para. 60, lines 1-20. The claim was further amended to recite that the determination is made whether the tokens match syntax statements in the library. This added requirement is disclosed in the Specification, see, Printed Publication, paras. 64-67, which discloses how syntax statements are obtained from the syntax library to parse the program statement. (“When an incomplete programming language statement is presented to the Code Assist Engine 830, it matches the statement command or verb to the command keywords in the syntax statements producing a result comprising those matching syntax statements to be considered for subsequent processing which generates proposals”, see, Printed Publication, para. 67, lines 6-11) The claim was further amended to recite generating proposals from the cursor position based on previous tokens in the partial program instruction that matched syntax statements in the syntax library. This added requirement is disclosed in the Specification, see, Printed Publication, para. 78, lines 10-13 and para. 79, lines 6-8, para. 80, lines 8-10.

The Examiner cited FIG. 13A, step 1334 and col. 17, lines 19-25 as teaching the pre-amended claim requirement of determining whether the tokens match (Third Office Action, pgs. 5-6), which now recites determining whether the tokens match one of a plurality of syntax statements in a syntax library for a computer language in which the partial program instruction statement is written.

The cited step 1334 mentions locating procedure ID token. The cited col. 17 mentions a token representing a procedure identifier for a programming language statement by examining a token in the token list. If it is determined that the identification token is not a symbol that can be resolved, then processing continues.

Although the cited col. 17 mentions examining a token in the token list, this cited section of Shulman does not disclose determining tokens that match one of a plurality of syntax statements in a syntax library for a computer language in which the partial program instruction statement is written.

With respect to the pre-amended claim language concerning generating the proposals, the Examiner cited FIG. 4, elements 210, 220, 202 211 of Shulman as disclosing these requirements. (Third Office Action, pgs. 3, 6) The cited Shulman mentions that after the user types the characters mytext 211, the character position follows the last character. In response to typing the separator character 212, the statement building tool determines the set of menu items that correspond to the object type mytext and a selection menu assist window 220 is displayed.

The cited FIG. 4 of Shulman discusses how if the user types a character, such as “f”, then there is an automatic search for menu items that begin with character “f”. The cited Shulman does not disclose determining whether “f” matches a syntax statement in a syntax library, and then if not, generating proposals based on previous tokens in the partial program instruction that matched syntax statements in the syntax library. Instead, Shulman mentions that upon typing a character, the program finds menu items that match the typed character. There is no disclosure of the added claim requirement finding proposals based on previous matching tokens if no match is determined.

The Examiner further cited steps 1337 and 1370 in FIG. 13B and col. 17, lines 40-45 as teaching the pre-amended claim requirement of in response to determining that the token on which the cursor is positioned does not match one of the syntax statements generating proposals from the cursor position. (Third Office Action, pg. 6) Applicants traverse with respect to the amended claim.

The cited steps 1337 and 1370 mention that if the token can be resolved, the processing continues. For instance, step 1337 states that if the present argument is a symbol, the assist window is generated. If it is not, control proceeds to step 1370 where control returns to step FIG. 10 or 11 where the statement building tool initializes an editing tool for use by the programmer. Nowhere does the cited Shulman disclose that if there is no match, proposals are generated from the cursor position based on previous tokens in the partial program instruction. Instead, in the cited step 1337 if there is a match with a symbol, the code assist window is generated.

The cited col. 17 mentions if the symbol cannot be resolved, processing continues at step 1338. At step 1338, the context of the present argument token is determined by invoking the compiler to bind against the set of known symbols, and assist window is generated to display the information relevant to the present argument token. This cited col. 17 does not disclose or

mention that if there is no match, proposals are generated from the cursor position based on previous tokens in the partial program instruction that matched syntax statements in the syntax library as claimed. Instead, the cited col. 17 mentions that if the symbol cannot be resolved, an assist window is generated to display the information relevant to the present argument token. This does not disclose generating proposals from the cursor position as claimed based on previous tokens that matched syntax statements.

The Examiner further cited FIGs. 5 and 6 and cursor 212 that moves to mytext and mytext.font. (Third Office Action, pg. 5) Applicants traverse. Shulman mentions that the building tool determines that the incomplete programming language statement mytext.font is an object of the font type and that a second selection menu assist window 530 displays a new set of menu items that correspond to the previously defined font object type for the user to select. (Shulman, col. 10, lines 26-37) Again there is no disclosure in the cited Shulman of generating proposed statements in response to determining that the statement mytext.font or some variation of it does not match syntax and based on previous tokens in the partial program instruction that matched syntax statements. Instead, the cited Shulman mentions that menu items that “correspond” to the defined object type are displayed.

Accordingly, claim 7 is patentable over the cited art because requirements of these claims are not disclosed in the cited Shulman.

Claims 8-12 and 20 are patentable over the cited art because they depend from claim 7, which is patentable over the cited art for the reason discussed above.

### 3. New Claims 22-26 are Patentable Over the Cited Art

Added claim 22 recites the method of claim 7 and further comprising: determining the computer language in which the partial program instruction statement is written; selecting one of a plurality of syntax libraries to use to determine whether the tokens match one of the plurality of syntax statements in the syntax library specific to the determined computer language.

The added requirements of claim 22 are disclosed in the Specification, see, Printed Publication, para. 60, lines 17-40.

Added claim 23 recites the method of claim 7, wherein the partial program instruction statement is parsed based upon syntax statements from the syntax library.

The added requirements of claim 23 are disclosed in the Specification, see, Printed Publication, paras. 64-67.

Added claim 24 recites the method of claim 7, further comprising: generating a cursor index when moving the cursor indicating last matching tokens in the partial program instruction; wherein generating proposals comprises generating proposals from the cursor index position for the last matched token

The added requirements of claim 23 are disclosed in the Specification, see, Printed Publication, paras. 74-76.

Added claim 25 recites the method of claim 24, wherein generating proposals comprises: generating proposals from the last matching token and adding the proposals to a proposal vector.

The added requirements of claim 25 are disclosed in the Specification, see, Printed Publication, para. 84.

Added claim 26 recites the method of claim 25, wherein proposal vectors are generated from multiple cursor engines parsing different parts of the program statements; concatenating the proposal vectors to create a combined proposal vector that is returned; matching the combined proposal vector to determine an image; displaying a window containing the determined image from which the user select a keyword, identifier or constant to continue entry of the partial program statement.

The added requirements of claim 26 are disclosed in the Specification, see, Printed Publication, paras. 83-84.

Added claims 22-26 are patentable over the cited art because they depend from claim 7, which is patentable over the cited art for the reasons discussed above and because the additional requirements of these claims in combination with the base claims provide further grounds of patentability over the cited art.

### Conclusion

For all the above reasons, Applicant submits that the pending claims 7-12, 20, and 22-26 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: May 19, 2008

By:           /David Victor/          

David W. Victor  
Registration No. 39,867

Please direct all correspondences to:

David W. Victor  
Konrad Raynes & Victor, LLP  
315 South Beverly Drive, Ste. 210  
Beverly Hills, CA 90212  
Tel: (310) 553-7977  
Fax: 310-556-7984